showing the location of the bullet was introduced in evidence. *Held,* no error. *State* v. *Matheson* (1905), — Ia. —, 103 N. W. Rep. 137.

The proposition of law enunciated in this decision is in accord with the decisions heretofore rendered upon the question of admissibility of X-ray photographs in evidence. The court cites in support of the position taken, the recent case of *Chicago & Joliet El. Ry. Co.* v. *Spence* (1904), — Ill. —, 72 N. E. Rep. 796, which case was the subject of comment in 3 MICH. LAW REV., 409. In the principal case the court further held that it was immaterial to the admission of an X-ray photograph, on an issue of the position and course of a bullet in the body of a person alleged to have been shot by defendant, that there was no evidence that the object represented in the radiograph was a bullet or that its position had not changed between the date of the shooting and the time the photograph was taken. In this connection the court said: "The process of X-ray photography is now as well established as a recognized method of securing a reliable representation of bones of the human body, although they are hidden from direct view by the surrounding flesh, and of metallic or other solid substances which may be imbedded in the flesh, as was photography as a means of securing a representation of things which might be directly observed by the unaided eye at the time when photography was first given judicial sanction as a means of disclosing facts of observation; and for that purpose X-ray photographs, or sciagraphs, or radiographs, as they are variously called, have been held admissible on the same basis as photographs. We think we can properly take judicial notice of the fact that a bullet imbedded in human flesh usually becomes encysted, and does not change its location without external interference."

GARNISHMENT—ONE RAILROAD AS DEBTOR OF ANOTHER.—The Boston and Maine R. R. Co. being summoned as garnishee of the defendant disclosed that it had in its possession money for which it was accountable to the defendant, partly for the use of defendant and partly to it as trustee for other roads and that it was now in possession of rolling stock of defendant in actual use part owned by defendant and part leased by it. *Held,* that the garnishee could not be charged for the money collected; nor could it be charged for rolling stock in actual use, nor for the leased cars whether in use or not. *Cox* v. *Central Vermont R. Co. et al.* (1905), — Mass. —, 73 N. E. Rep. 885.

The court reasoned that the garnishee was not liable for the money collected, because there was no practical way of ascertaining the proportion to which the defendant was entitled, basing its decision on *Chapin* v. *R. R. Co.,* 16 Gray (Mass.) 69. Several cases have been recently decided where one railroad company has been summoned as garnishee of another, and it has generally been held that the company can not be charged where its liability depends upon final adjustment of involved mutual accounts in which the balance is changing with every day's business; and also, as in the principal case, that the garnishee cannot be charged for rolling stock in actual use. *Connery* v. *R. R. Co.* (1904), Minn. 99 N. W. 365, 64 L. R. A. 624; *Wall* v. *R. R. Co.* (1902), 52 W. Va. 485, 64 L. R. A. 501; *Michigan Central R. R. Co.* v. *Chicago and M. L. S. R. R. Co.* 1 Ill. App. 399.